

**IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT
OF ALABAMA, EASTERN DIVISION**

WENDELL DEAN VAN METER,)

NEVA JANE VAN METER,)

Plaintiffs,)

v.)

THE CITY OF LANETT,)

ALABAMA; OSCAR CRAWLEY,)

individually and as Mayor of the City)

of Lanett; KYLE MCCOY,)

individually and as Lanett City)

Councilman; JOHN DUSKIN,)

individually and as Lanett City)

Councilman; MIKE YARBROUGH,)

individually and as Lanett City)

Councilman; JOEL G. HOLLEY,)

individually and as Lanett City)

Manager)

Defendants.)

Case No.: 3:06-CV-583-DRB

DEFENDANT'S VOIR DIRE

COME NOW the Defendants, the City of Lanett, Mayor Oscar Crawley, City Manager Joel Holley, Councilman Kyle McCoy, Councilman John Duskin, and Councilman Mike Yarbrough, by and through their attorney of record, and list the following Voir Dire questions:

1. Have any of you or any member of your family ever been represented by Jim Ingram or Bill Harris, both of whom practice in Lanett/Valley, Alabama?

2. If so, the fact that you or a member of your family have been represented by one of them or both, do you feel you could be a fair and impartial juror in this case where they represent the Plaintiffs?
3. Are any of you related, by blood or marriage, or do you know Mr. and Mrs. Van Meter?
4. Do any of you feel you could not be fair to the Defendants for whatever reason because the Defendants are the City of Lanett, its Mayor, City Manager, and Councilmen?
5. Do any of you feel like you could not be a fair and impartial juror when a city is a defendant?
6. Do any of you feel that due to your own personal experiences, you could not be fair to the City, its Mayor, City Manager, and Council Members?
7. Have any of you or any member of your family ever had any type of conflict, disagreement, or other type of problem with anyone with the City of Lanett, its Mayor, its City Manager, or Council Members?
8. Have any of you ever filed a claim against the City of Lanett?
9. Have any of you ever filed a claim against any city?
10. Do any of you feel that you could not be fair to the Defendants because the Plaintiff was a police officer with the City for over twenty years?
11. Do any of you feel that you could not be able to put your sympathy aside and be a fair and impartial juror for the Defendants due to the Plaintiff having been a police officer?
12. Have any of you or any member of your family ever been terminated from a job and felt that it was done wrongfully?

13. If so, could you put your own personal recollections aside and be a fair and impartial juror in this case, which revolves around the Plaintiff being terminated from his employment?

14. After hearing all the questions of the Court, the Plaintiffs, and myself, is there any one that feels for any reason that you could not be a fair and impartial juror in this case?

Respectfully Submitted,

/s/ T. Randall Lyons
T. RANDALL LYONS (LYO006)
Attorney for Above-Named Defendants

OF COUNSEL:

Webster, Henry, Lyons & White, P.C.
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CERTIFICATE OF SERVICE

I hereby certify that I have this date of August 22, 2007, electronically filed the foregoing with the Clerk of the Court using the State of Alabama's electronic filing system which will send notification and a copy of such filing to the following counsel of record:

James C. Ingram, Jr.
P.O. Box 285
Lanett, AL 36863

William G. Harris
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/s/ T. Randall Lyons
OF COUNSEL